

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DISTRICT

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:14CR00175 AGF (DDN)
)	
MARK PALMER,)	
SAMUEL LEINICKE,)	
CHARLES WOLFE, a/k/a "Chuck Wolfe,")	
and ROBERT WOLFE.)	
)	
Defendants.)	

GOVERNMENT'S SECOND MOTION FOR ADDITIONAL TIME TO FILE
RESPONSE TO DEFENDANTS' OBJECTIONS
TO REPORT AND RECOMMENDATIONS

Comes now the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and James C. Delworth, Jennifer Winfield, and Erin Granger, Assistant United States Attorneys for said District, and for its Second Motion for Additional Time to File Responses to Defendants' Objection to Report and Recommendations (Doc. No. 282) states as follows:

1. Defendants are charged with *inter alia*, conspiracy to distribute and to possess with the intent to distribute Schedule I controlled substances and Schedule I controlled substance analogues intended for human consumption and conspiracy to introduce misbranded drugs into interstate commerce.

2. On October 8, 2015, Defendants filed three separate motions to dismiss the indictment and one motion for a bill of particulars. The Government filed its response on November 16, 2015. Following, Defendants filed replies to the Government's response on December 3, 2015

as well as supplemental memoranda on June 3, 2016. On June 10, 2016, the Government filed a Response to Defendants' supplemental memoranda.

3. On July 19, 2016, the Honorable David D. Noce, United States Magistrate Judge, issued a Report and Recommendations on Defendants' motions to dismiss and motion for bill of particulars. Judge Noce ordered the parties to file any objections by August 4, 2016. Following the report, Defendants moved for an extension of time to file objections and that request was granted. On August 18, 2016, Defendants filed their objections.

4. The Government wishes to file a response to Defendants' objections. Due to the number of issues and volume of material involved in this objection response as well as the undersigned's current workload, which included an argument presented to the 8th Circuit Court of Appeals on September 23, 2016 in United States v. Damien Morgan 16-1525, the Government requests additional time in which to respond.

WHEREFORE, Counsel for the Government respectfully request this Honorable Court to grant the government, up to and including **September 30, 2016**, in which to file responses to Defendants' objections.

Respectfully submitted,

RICHARD G. CALLAHAN
United States Attorney

s/ Erin Granger
ERIN GRANGER, #53593MO
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, MO 63102
(314) 539-2200

CERTIFICATE OF SERVICE

I hereby certify that on September 26, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

s/ Erin Granger
ERIN GRANGER, #53593MO
Assistant United States Attorney